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## **Data Protection**

#### What the Data Protection Act 2018:

The Data Protection Act of 2018 is a new legislation enacted by the British government which complements and expands upon the General Data Protection Regulation (GDPR) law created by the European Union. Both of these legislations were created to ensure the both the safety and integrity of a person's personal data by managing the way organisations are able to store and process this it. According gov.uk, the The Data Protection Act 2018 states that personal data used by organisations must be:

- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage"

gov.uk (2018) *Data protection.* Available at: <a href="https://www.gov.uk/data-protection">https://www.gov.uk/data-protection</a> (Accessed 06/11/2018).

#### What is General Data Protection Regulation:

The General Data Protection Regulation or GDPR, is a new law created and put in place by the European Union in 2018. It's aim is similar to that of the Data Protection Act 2018, to ensure the safety of a person's personal data while it's being store and/or processed by an organisation. The principles set out by GDPR which the Information Commissioner's Office provide are as follows:

- Lawfulness, fairness and transparency
- Purpose limitation
- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

ico.org.uk (2018) *Guide to the General Data Protection Regulation (GDPR)*. Available at: <a href="https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/principles/">https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr/principles/</a> (Accessed 06/11/2018).





#### Why are they important to Ufix Ltd.:

Both of these laws are essential to those working at Ufix Ltd. As they are a recruitment company, they handle the personal information of not only their employees but also the information of potential employees. Because of this those working there need to be extra careful when managing this data and be sure to conform to the principles set out by both the Data Protection Act 2018 and GDPR. Failure to do so could lead to serious issue for Ufix Ltd...

#### Consequences:

There are a few major consequences Ufix Ltd. may face if they fail to conform to the governing rules of both the Data Protection Act 2018 and GDPR. For example, Ufix Ltd. is found to have neglected the security of a person's personal data which they hold and depending on the severity of the situation they may be required to pay a fine of up to €10 Million or 2% of their annual turnover (Whichever results in a higher figure) or, €20 Million or 4% annual turnover (Whichever results in a higher figure). Either of these fines can be devastating to Ufix Ltd.





## **Business Ethics & Conduct**

This code of ethics and professional conduct outlines the ethical principles that govern decisions and behaviour at Ufix. They give general outlines of how employees should behave, as well as specific guidance for handling issues like harassment, safety, and conflicts of interest.

#### Be patient and courteous

#### Be inclusive

We welcome and support people of all backgrounds and identities. This includes, but is not limited to members of any sexual orientation, gender identity and expression, race, ethnicity, culture, national origin, social and economic class, educational level, colour, immigration status, sex, age, size, family status, political belief, religion, and mental and physical ability. **Be considerate** 

We all depend on each other to produce the best work we can as a company. Your decisions will affect clients and colleagues, and you should take those consequences into account when making decisions.

#### Be respectful

We won't all agree all the time, but disagreement is no excuse for disrespectful behaviour. We will all experience frustration from time to time, but we cannot allow that frustration become personal attacks. An environment where people feel uncomfortable or threatened is not a productive or creative one.

#### Choose your words carefully

Always conduct yourself professionally. Be kind to others. Do not insult or put down others. Harassment and exclusionary behaviour aren't acceptable. This includes, but is not limited to: - Threats of violence. - Discriminatory jokes and language. - Sharing sexually explicit or violent material via electronic devices or other means. - Personal insults, especially those using racist or sexist terms. - Unwelcome sexual attention. - Advocating for, or encouraging, any of the above behaviour.

#### Repeated harassment of others

In general, if someone asks you to stop something, then stop.

When we disagree, try to understand why

Differences of opinion and disagreements are mostly unavoidable. What is important is that we resolve disagreements and differing views constructively.





#### Our differences can be our strengths

We can find strength in diversity. Different people have different perspectives on issues, and that can be valuable for solving problems or generating new ideas. Being unable to understand why someone holds a viewpoint doesn't mean that they're wrong. Don't forget that we all make mistakes, and blaming each other doesn't get us anywhere.

Instead, focus on resolving issues and learning from mistakes.





# Discipline and Termination Policy

#### PURPOSE OF POLICY

The objectives of Ufix's policy are to:

- correct and/or improve the standard of conduct of an employee where appropriate or necessary;
- provide any particular employee with an opportunity to correct unacceptable conduct (other than in situations where summary dismissal is appropriate);
- ensure that all employees are treated fairly, equally and consistently; and
- ensure that each situation is reviewed and addressed on an individual basis and in relation to the particular circumstances.

#### APPLICATION OF THIS POLICY

This Policy applies to all employees of Ufix. This Policy does not form part of any contract between an employee and Ufix.

The operation of this Policy is not limited to the workplace or work hours. This Policy extends to all functions and places that are work-related or out of work conduct of the employee that may impact on Ufix. A work related function is any function that is connected to work, for example work lunches, conferences, Connect Group meetings etc. Employees must comply with this Policy at all work-related functions. This Policy also applies when employees go to other places in connection with work, for example, when visiting church and community members, suppliers and contractor's premises. In circumstances where an employee's behaviour or conduct may involve a breach of any Australian law, Ufix may notify the police or other relevant government authority.

#### **GROUNDS FOR DISCIPLINARY ACTION**

An employee may be the subject of disciplinary action for matters relating to their performance, capacity or conduct, including (but not limited to) the following:

Unsatisfactory Performance





- Unacceptable Conduct
- · Wilful or Serious Misconduct

#### **DISCIPLINARY PROCEDURE**

The procedures outlined below are intended as a GUIDE ONLY to the disciplinary procedures which may be implemented by Ufix. In every case, the actual disciplinary procedure to be adopted will be a matter for the individual manager or

supervisor's discretion and in consideration of the circumstances of the case as a whole. Nothing in this Policy prevents Ufix from issuing a final warning at any stage of the process. Similarly, if the circumstances warrant, nothing in this Policy prevents Ufix from dismissing an employee at any stage of the procedure, for example in circumstances involving wilful or serious misconduct by an employee.

Pastors/Managers should consult with the Human Resources Manager before commencing any disciplinary procedures.

#### Investigation

Depending on the circumstances it may be necessary to conduct an investigation into the incident and/or allegations. This may involve collecting relevant data and interviewing relevant witnesses, such as the employee's co-workers or supervisors, or even customers and suppliers with whom the employee has had contact. Ufix will endeavour to investigate all allegations of unsatisfactory performance, unacceptable conduct, or willful or serious misconduct by an employee fairly and promptly. If Ufix believes that following an allegation of unacceptable behaviour it would be inappropriate for an employee to remain at work, Ufix may suspend the employee from duty on ordinary pay pending completion of an investigation. In such circumstances, the employee will be informed in writing of the conditions of the suspension at the time of the suspension.

#### Disciplinary interview

If on the basis of the investigation, Ufix believes that there is a case to be answered by the employee, the employee may be asked to attend a meeting to discuss the issue(s) of concern.

The following procedure will generally be followed:





- The employee will be given advance notice of the meeting and what will be discussed at the meeting.
- 2) The employee will be given a reasonable opportunity to have a co-worker present at the meeting.
- 3) At the meeting the issue(s) of concern or allegations will be put to the employee, including any evidence upon which those concerns or allegations are based.
- 4) The employee will be given an adequate opportunity to respond to the concerns or allegations.
- 5) The manager will consider the employee's response and make any further enquires or investigations that may be necessary.
- 6) After making any further enquiries or investigations which may be necessary and after consideration of the response or explanation of the employee, the manager/supervisor will determine whether the concern(s)

or allegations have been proven.

- 7) If it is determined that all or some of the concerns or allegations are proven and after consideration of:
  - (i) the seriousness of the poor performance/misconduct;
  - (ii) the response or explanation given by the employee;
  - (iii) the employee's employment history and record; and
  - (iv) whether there are appropriate and reasonable alternatives to termination, the manager/supervisor will make a decision on what, if any, disciplinary action is appropriate.

#### **Disciplinary Action**

This Policy outlines a number of formal and informal ways of dealing with employees whose performance, capacity or conduct is unsatisfactory or otherwise unacceptable. The disciplinary action taken will vary from case to case, depending upon all of the circumstances, including a consideration of whether the employee has received any prior verbal or written warnings in relation to their performance, capacity or conduct.

Regardless of whatever disciplinary action is imposed, any further unsatisfactory performance, unacceptable conduct or misconduct of any kind may result in the dismissal of the employee.

#### **Informal Disciplinary Action**

Examples of informal disciplinary action which may be taken by Ufix include, but are not limited to, the following:

- redirection, retraining;
- reorganisation/redeployment; and
- counselling.





Informal disciplinary action is not appropriate where the employee's conduct amounts to willful or serious misconduct.

## Formal Disciplinary Action

Examples of formal disciplinary action which may be taken by Ufix include, but are not limited to, the following: verbal warning/counselling;





# Safety Policy

#### **Safety Procedures**

A procedure sets out the steps to be followed for work activities.

A procedure will document and list all hazards with a certain work task. This will then inform employees of the steps needed to safely complete the task, including protective equipment required.

According to the Health and Safety Executive, there are over 150,000 injuries in the workplace each year in the UK.

Typical health and safety policy and procedures should include:

- · All risks present in your workplace
- Staff training
- $\cdot$   $\;$  The must be enough emergency exits for everyone to escape quickly, and they must not be obstructed
- · How you are managing any hazardous substances, equipment or machinery?
- · The actions required to minimise risks
- · Whose responsibility is it to ensure these actions are taken
- · Who records incidents and tasks
- · What happens if there is incident? How will these be

managed and the effects minimised?

A bespoke health and safety agreement must be drawn up for the workplace for dangers and risks will not be identical between companies.

Employers have a duty of care towards their employees to ensure their health and safety at the workplace are respected, managed and provided for.





# Confidentiality & Non-Disclosure

This policy applies to all employees of UFIX LTD, including board members, investors, contractors and volunteers, who may have access to confidential information.

# Policy brief & purpose

This policy is designed for **company confidentiality and non disclosure** to explain how we expect our employees to treat confidential information. Employees will unavoidably receive and handle personal and private information about clients, partners and our company. We want to make sure that this information is well-protected.

# We must protect this information for two reasons. It may:

- Be legally binding (e.g. sensitive customer data.)
- Constitute the backbone of our business, giving us a competitive advantage (e.g. business processes.)

## What employees of UFIX LTD should do:

- Lock or secure confidential information at all times
- Shred confidential documents when they're no longer needed
- Make sure they only view confidential information on secure devices
- Only disclose information to other employees when it's necessary and authorized





## What employees OF UFIX LTD shouldn't do:

- · Use confidential information for any personal benefit or profit
- Disclose confidential information to anyone outside of our company
- Replicate confidential documents and files and store them on insecure devices

When employees stop working for our company, they're obliged to return any confidential files and delete them from their personal devices.

## Confidentiality Measures:

We'll take measures to ensure that confidential information is well protected. We'll:

- · Store and lock paper documents
- Encrypt electronic information and safeguard databases
- Ask employees to sign non-compete and/or non-disclosure agreements (NDAs)
- Ask for authorization by senior management to allow employees to access certain confidential information

### Non-disclosure:

Each Ufix employee signs our non-disclosure policy. A copy is included below and states:





I agree that I will hold confidentially any and all knowledge or information that I may obtain in the course of my employment with UFIX LTD or from working with UFIX LTD clients and with respect to the secret processes, sensitive or personal information. used by UFIX or UFIX clients in delivering its services.

I will keep confidential information so long as that information remains confidential and is not otherwise available in the public domain.